

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

June 04, 2020

David J. Bradley, Clerk of Court

United States of America

)

v.

)

DEAN A. EWING

)

)

)

)

)

Case No. **4:20mj0995**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 10, 2019 in the county of HARRIS in the
SOUTHERN District of TEXAS, the defendant(s) violated:

Code Section

Offense Description

18 USC 371

Conspiracy

This criminal complaint is based on these facts:

See affidavit

Continued on the attached sheet.



Complainant's signature

Wayne Palomar, Postal Inspector

Printed name and title

Sworn to before me telephonically.

Date: June 04, 2020



Judge's signature

Peter Bray, Magistrate Judge

Printed name and title

City and state: Houston, TX

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

1. I, United States Postal Inspector Wayne G. Palomar, have been employed by the U.S. Postal Inspection Service since 2001. I am currently assigned to the Financial Crimes Team in Houston, TX and have received specialized training in numerous Postal crimes, primarily those involving identity theft, bank fraud and credit card fraud related offenses. I am familiar with how identity thieves use victims' information to create identification documents to negotiate credit cards and checks stolen from the U.S. Mail for financial gain.
2. The information set forth in this Affidavit is based upon Affiant's personal knowledge and/or information provided to Affiant by other law enforcement officers, fraud investigators, and other individuals the undersigned believes to be reliable and credible.
3. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each and every fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that **Dean A. EWING** has committed violations of federal law.
4. During the months of January 2019 to December 2019, the U.S. Postal Inspection Service received numerous complaints of mail theft from the Greater West Houston Area to include addresses in Katy, Harris County and Fort Bend County, TX. These complaints involved Apartment panel boxes that were pried open or accessed with counterfeit postal arrow keys and mail stolen, particularly loan checks from Regional and Republic Finance.
5. Regional Finance Fraud Analyst R. Zajaczkowski-Nalley provided Affiant information regarding reported loan check fraud (checks made out to victims from Regional Finance). Suspects stole the checks from the mail from the greater Houston area and then negotiated them using counterfeit identification documents at banks.

From the period of January 2019 to December of 2019, approximately **\$731,500** were negotiated as fraud with fraud affidavit's completed by victims.

6. On August 5, 2019, Kali HUBBARD was arrested by the Harris County Sheriff's Office for a state charge of identity theft (Fraud Use/Possession of Personal Identifying Information) and found in possession of various pieces of mail, credit/debit cards, and various documents containing personal identifying information of others. A counterfeit Postal Arrow Key was recovered from her possession used to access Postal Mail Collection Boxes/Equipment. During an interview with Postal Inspector E. Casarez, she admitted to obtaining the key from a "Dean" (later identified as Dean A. **EWING**) who made the key.
7. On November 11, 2019, Harris County Precinct 5 Detective R. Hottman, a certified Police Officer in the State of Texas, known to be a credible and reliable person, reviewed Precinct 5 case number HC1911-00319 in which an M. WHITE was taken into custody for the state charge of Identity Theft. WHITE identified **CRUTCHER** as the person who printed him a fake paper driver's license with another person's identifying information and who filled out an online application to purchase a vehicle fraudulently. M. WHITE identified **CRUTCHER** and Meredith L. **WALKER** as the leads of a group (Guillermo **DIAZ**, Kali **HUBBARD**, Jorge L. **SANTIAGO**) that stole mail from mailboxes using postal keys to steal people's identities. WHITE stated the group had a motel room (14833 IH-10E, Room 118, Houston, Harris County, Texas, 77094) set up with a computer and printers to make fake identification documents to cash checks.
8. On December 10, 2019 a state search warrant was obtained for 14833 IH-10E, Room 118, Houston, Harris County, Texas, 77094. Upon observation, the bathroom area of the room was set up like an I.D. making workshop with printers set up around the laptop along with counterfeit paper Texas Driver's Licenses and financial documents to include loan checks and U.S. Mail of others. The following items were recovered: SILVER HP PROBOOK S/N CNU2083ND4, SILVER DELL LAPTOP NO S/N, PINK GALAXY NOTE 9 NO S/N, along with, cell phones, printers, loan checks in

various names, counterfeit paper Texas Driver's Licenses in various names with the photos of Guillermo DIAZ, Kali HUBBARD, Jorge L. SANTIAGO and others, blank and filled out checks, U.S. Mail belonging to others, credit cards, gift cards, a black accordion organizer with financial documents of others. The documents appeared to be from addresses in and around the Greater Houston area. Meredith L. **WALKER**, Guillermo **DIAZ**, Kali N. **HUBBARD**, Jorge L. **SANTIAGO** and Marc A. **PARKER** associated with Room 118 and arrested for state identity theft crimes and other local charges.

9. On December 10, 2019, at approximately 08:26 P.M. (Precinct 5 Report #1912-00349), Investigators conducted surveillance of Security Storage located at 1611 S Dairy Ashford (storage units rented in WALKER and CRUTCHER's name). Investigators observed a male and female removing items from CRUTCHER's storage unit. The male (driver) and female (passenger) sat back inside the vehicle (a 2016 silver BMW) and were watching a movie when deputies approached. Upon contact, deputies observed narcotics paraphernalia laying in plain view inside the vehicle (in the back seat and on the floorboard behind the driver's seat). Based on their training and experience and upon seeing the possible evidence, deputies conducted a narcotics investigation and secured the evidence. The subjects were identified as **EWING** and **CRUTCHER** and deputies recovered methamphetamine from the center console of the vehicle. Based on the facts of the case the Harris County ADA Hecht accepted charges for Possession of a Controlled Substance on both subjects.
10. Deputies recovered (vehicle inventory search) a purse from the front passenger floorboard of the vehicle where **CRUTCHER** was sitting. The purse contained a Texas Food Stamp Card with CRUTCHER's name on it along with a Texas I.D., several credit cards in other people's names, a **BLACK/BLUE SAMSUNG GALAXY NOTE 9 IMEI: 356569092034325 (TARGET DEVICE 1)**. CRUTCHER later claimed the cell phone because she wanted to make a phone call from it. The **BLACK APPLE IPHONE S/N 353097102736732 (TARGET DEVICE 2)** was recovered from EWING incident to his arrest.

11. On December 12, 2019, Inspector E. Casarez interviewed L. Howell-Sims in the Harris County Jail regarding a previous mail theft investigation. She knew Dean (**EWING**) and stated he was manufacturing Postal Arrow Keys (referred to as "keys") and sold them for \$1500. **EWING** would brag about stealing mail. Inspectors obtained signed consent from SIMS to access her cell phone and recovered it from her jail property.
12. Forensic cell phone results identified two phone numbers in the SIMS cell phone address book (**Dean** 281-777-8179 and **Crutcher, Nicole** 346-213-8183). Inspectors viewed text messages between Howell-Sims and the phone number 281-777-8179 (Dean). The text messages were from July 2019 to September 2019 regarding **EWING** making keys, stealing checks out of the blue (collection) box and asking Howell-Sims to go get mail. Messages between them ceased as of September 2, 2019 possibly due to Howell-Sims arrest and confinement for state identity theft charges.
13. On April 28, 2020, a forensic examination was completed of **TARGET DEVICE 1** (recovered from the **CRUTCHER** arrest). The phone number was found to be 713-238-4412.
14. On May 15, 2020, a forensic examination was completed of **TARGET DEVICE 2**. The phone number for the device was confirmed as 281-777-8179. In the address book, the phone number for TARGET DEVICE 1 (713-238-4412) was listed under "**Nicole Crutcher**." Affiant observed text messages between **TARGET DEVICE 1 AND 2**. These messages consisted of; **CRUTCHER** asking **EWING** to make a "key" for the Katy area for "Kalie" (HUBBARD) and she would pay \$300 if he could make it that day along with a key for the Tomball area for **CRUTCHER**. Additional messages describe how **EWING** made counterfeit I.D.'s, the arrest of the WALKER group at the aforementioned hotel and going to the storage unit on Dairy Ashford (where **EWING** and **CRUTCHER** were arrested).
15. Multimedia Messaging Service (MMS) messages between "Meredith" (Meredith **WALKER** in address book) and **EWING** asking **EWING** to make I.D.'s for the

following individuals; Will **DIAZ**, Marc Anthony **PARKER** and Jorge **SANTIAGO** (**DIAZ, PARKER and SANTIAGO** were part of the group arrested with **WALKER** on December 10, 2019 see paragraph 8). Photos of **DIAZ, PARKER** and **SANTIAGO** were sent MMS to **EWING** along with corresponding photos of Regional Finance Checks (later determined to be fraudulently negotiated) in the names of; E. OINEON, F. SCARPA, B. THORNTON (secondary I.D. and/or paper TX DL with Scarpa, Oineon and Ortega information and **DIAZ** photo recovered from search-paragraph 8), O. LOGINOVA (PARKER) and S. TOWNSEND (SANTIAGO). Additionally, messages from **WALKER** requested I.D.'s for herself for the Regional Finance Checks in the names of P. Manning and N. Platt (secondary I.D.'s recovered from search with **WALKER**'s photo and victim information discovered in **TARGET DEVICE 2**).

16. MMS messages from **EWING** (to phone number 281-928-6855) have him providing the log-in account information (User Name and password) for the people search website "PublicData.com." Additional messages show **EWING** sending and receiving images of PII for Victims with phone number 281-928-6855 and other numbers listed in the phone address book.
17. Documents and photos on the **EWING** phone were observed with other people's personal identifying information (PII) such as Victims; K. Trepanier, D. Trepanier, M. Maldonado, D. Rubio, S. Rodriguez, J. Rojas, J. Berley, S. Summers, J. Ramsey and B. Bradburry from people search websites such as "PublicData.com" and "Been Verified." These people search websites are commonly used by identity thieves to find PII for individuals such as; name, dob, I.D. numbers, addresses. Videos and photos of; TX Drivers licenses, stacks of checks, Mariner Finance checks, hologram overlays for TX Drivers licenses and I.D. making equipment existed on the phone.
18. Based on the forgoing information, Affiant has reason to believe and does believe that, on or about January 1, 2019, through December 10, 2019, Dean A. **EWING** committed the offense(s) of Conspiracy, 18 USC 371.



Wayne G. Palomar
United States Postal Inspector

Sworn and Subscribed to me telephonically this 4th day of June, 2020, and I find probable cause.



Peter Bray
United States Magistrate Judge
Southern District of Texas